

**2018-2019 Free Application for Federal Student public comments and responses**

#	Comments	Commenter	Response
1.	<p>RE: 2018-19 FAFSA on the Web (FOTW) Fields: 103a-103h - Student's college selections and housing plan at each college                      Requesting more fields for FOTW for college selections We have found with the early FAFSA, that 10 school fields are not enough since students are not yet sure to which schools they will apply. Some of our accepted students successfully completed their FAFSAs in October, but did not add our school code because it was so early in their decision-making process that they hadn't yet considered our institution. They were then hesitant to remove one of the other 10 schools because they still wanted to receive financial aid offers from all of them. Please consider increasing this area of FOTW to include additional college selection fields.</p>	<p>Janet Turner, University of Portland</p>	<p>Department of Education research for the most recent year available (2016-2017) shows that the percentage of applicants who list 10 schools on their <i>Free Application for Federal Student Aid (FAFSA®)</i> is extremely low.</p> <p>An increase in the number of colleges on the FAFSA would require many system and Web site changes as well as a change to the file layout of the <i>Institutional Student Information Record (ISIR)</i>, which would impact the Central Processing System, software providers, and other systems with which the CPS interfaces. Based on the data, the Department of Education does not believe there is a strong need to make such changes at this time.</p> <p>However, help text has been revised to better inform applicants that every school listed on any transaction will receive an ISIR. For more information, see the document entitled <i>Summary of Enhancements to fafsa.gov for 2018-2019</i>.</p>
2.	<p>Question re: "Payments to tax-deferred pension and retirement savings plans (paid directly or withheld from earnings)..." should readily appear without having to check a box first. So many people miss this question because they don't check the box. Then, we catch it on the CSS PROFILE. Some families would not be Pell eligible if they checked this box and accurately reported their tax-deferred pension payments.</p>	<p>Jessica Black, Lewis &amp; Clark College</p>	<p>No Change. The Department of Education needs to further assess the impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the <i>Free Application for Federal Student Aid (FAFSA®)</i>.</p>
3.	<p>Can there be an option to get a status of non-filing automatically linked to the FAFSA?</p>	<p>Damian Gugliotti</p>	<p>No Change. The IRS Data Retrieval Tool (IRS DRT) is only available if there is a tax return on file with the IRS for the year requested. FAFSA applicants who have not filed the requested year's tax return cannot access the IRS DRT because the IRS cannot verify their identity when there is no tax return on file. By law, tax records are confidential and IRS cannot share an applicant's filing status with anyone other than the tax filer.</p>
4.	<p>Independent students should be required to supply their spouses name; SSN and DOB. This would be very helpful when determining if all required documents have been received for verification. It may also help with IRS collection detail.</p>	<p>Karen Griffin, East Central College</p>	<p>No Change. The Department of Education limits the collection of information to data necessary to determine eligibility in order to simplify the application process</p>

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5.	<p>1. A significant amount of figures from the additional untaxed information box are missed because a) some are imported from the DRT, and some are not and b) they are immediately after the information that is all imported from the DRT, making families think that the DRT automatically pre-populated the only figures that the applicant has. This makes many families miss important data elements like tax deferred pensions, and child support received. My suggestion would be to separate the items that can be retrieved, from those that require the applicant to input their data.</p> <p>2. The taxable grant and scholarship question is incorrectly completed by MANY applicants. This field makes a significant impact on the EFC. Families get very frustrated because they input the figure from their 1098-T, and feel that they have been tricked into inputting this figure incorrectly. By applicants using the figure from their 1098-T, this causes their EFC to decrease, potentially giving them access to Federal Pell Grant funds they are not eligible for. I would recommend either removing this question completely or finding a way to have this imported from the DRT.</p> <p>3. If neither of these are an option, I would suggest adding text that states that this is NOT the figure from the 1098-T.</p>	Anonymous	<p>1. No Change. The Department of Education needs to further assess the impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the <i>Free Application for Federal Student Aid</i> (FAFSA®).</p> <p>2. Question labels and associated help text have been revised. For more information, see the document entitled <i>Summary of Enhancements to the 2018-2019 Free Application for Federal Student Aid</i>.</p> <p>3. <a href="#">Refer to comment #5.2 for resolution.</a></p>
6.	<p>I suggest the following wording changes:</p> <p>1) #32 draft For 2016, have you (the student) completed your IRS income tax return or another tax return listed in question 33? Suggest: Have you (the student) completed your 2016 IRS income tax return or another tax return listed in question 33?</p> <p>2) #34 draft For 2016, what is or will be your tax filing status according to your tax return? Suggest: What is or will be your tax filing status according to your 2016 tax return?</p> <p>3) #80 draft For 2016, have your parents completed their IRS income tax return or another return listed in question 81? Suggest: Have your parents completed their 2016 IRS income tax return or another return listed in question 81?</p> <p>4) #82 draft: For 2016, what is or will be your parents' tax filing status according to their tax return? Suggest: What is or will be your parents' tax filing status according to their 2016 tax return?</p>	James Phinney, North Central State College	<p>1. No Change. The Department of Education considers this suggestion a stylistic preference.</p> <p>2. No Change. The Department of Education considers this suggestion a stylistic preference.</p> <p>3. No Change. The Department of Education considers this suggestion a stylistic preference.</p> <p>4. No Change. The Department of Education considers this suggestion a stylistic preference.</p>

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7.	After reviewing discrepancies for the 399 code it is apparent that families do not understand question 44 d. Many families enter the 1098-T form figure in this field and the EFC is lowered by this inaccurate figure. It is my recommendation to either 1) remove the question or 2) make it clear that this is NOT the 1098-T figure.	Anonymous	<a href="#">Refer to comment #5.2 for resolution.</a>
8.	<p>1. Suggestion #1: For Dependent students, Question 59 may still cause confusion because of wording - especially for students whose parents are divorced and remarried. I would suggest smart logic that asks the marital status of the student's BIOLOGICAL parents and if the student indicates they are divorced/separated, then follow up with a question asking if the parent then currently/most recently live with is remarried. I have had many students whose parents are remarried answer this question incorrectly.</p> <p>2. Suggestion #2: For Dependent students, stop asking them for tax/earning information. Most Dependent students do not make a significant amount of income. This would simplify the FAFSA application process and would, most likely, not change a student's aid amount significantly. Dependent students who have higher incomes, and whose parents do not, are many times helping out with household bills that are not considered when calculating the EFC. Also, a student's savings should not have as much of an effect (current =20%) on their EFC</p>	Susan Creager	<p>1. No Change. The Department of Education needs to further assess the impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the <i>Free Application for Federal Student Aid</i> (FAFSA®).</p> <p>2. No Change. These questions are statutorily required. Refer to the 2018-2019 <a href="#">Justification of Data Elements</a> posted with the clearance package.</p>
9.	During this period of reviewing SAR 399 comments, we have seen many instances of student reporting values of Taxable Grant/Scholarship Aid (44/93D) where 1. the student was a non-tax filer and therefore couldn't have had a value in this box (no AGI). 2. we've seen instances where this value was greater than the student's reported AGI, again this isn't possible. Tax Transcripts do not indicate whether or not the wages were from SCH or not (the SCH comment only shows on the students' 1040 form) and since we are not able to use 1040 forms for verification it becomes cumbersome to ask for yet another tax-type document from students and families, especially since tax returns and tax transcripts are almost always identical.	Steven Powell	<a href="#">Refer to comment #5.2 for resolution.</a>
10.	In response to proposed changes to question 59 to read "As of today, what is the marital status of your parents?". This will still confuse families as most families view this question as "biological" parents, and do not consider a step-parent a parent. Could this question be changed to "As of today what is the marital status of the parent(s) listed on the application?". There needs to be some	Kirsten Oesau, Hendrix College	No Change. The Department of Education needs to further assess the impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the <i>Free Application for Federal Student Aid</i> (FAFSA®).

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	wording to direct families that they are required to include the step-parent. Most of the families do not read the instructions or click on the link that describes what is considered a parent.		
11	I recommend keeping the question "Have you filed a 1040X Amended Tax Return?" and subsequent parent question if needed on the FAFSA regardless if the IRS DRT is available or not and have that question be a part of the actual paper FAFSA as well. We find that students incorrectly answer this question often and cannot make a change on their FOTW unless they have a different correction to make as well.	Anonymous	No Change. The Department of Education limits the collection of information to data necessary to determine eligibility in order to simplify the application process. Since amended return filers can now use the IRS Data Retrieval Tool, this question is no longer needed.
12	I agree	Anonymous	Thank you for your comment.
13	Can a 'suffix' field be added to the student name fields to allow seamless electronic matching when students add in "JR", "SR" or "III", etc? Many times these will not load in our system without manual intervention and can cause issues throughout the entire year if we don't remove this information from the FAFSA.	Anonymous	No Change. The Department of Education needs to further assess the impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the <i>Free Application for Federal Student Aid</i> (FAFSA®).
14	We have had problems with families whose parents filed jointly for the required tax year but are now divorced or widowed. The logic prevents them from moving forward with having those two statuses on file, but it is very possible to have parents who filed a joint return in 2016 but are reporting as widowed or divorced in 2017/18. Please take that into consideration when reviewing this upcoming year's FAFSA	Tori Nuccio, West Chester University	No Change. The Department of Education added messaging and help text to the 2017-2018 online <i>Free Application for Federal Student Aid</i> (FAFSA®) to assist applicants and parents in properly reporting their financial information if they experienced a marital status change after filing their 2015 income tax return. This change will carry forward to 2018-2019. For more information visit the <a href="https://fafsa.gov">fafsa.gov</a> help page and search <a href="#">marital status</a> .
15.	Although I am pleased that the "youth" aspect of the unaccompanied homeless youth determination has been removed from the FAFSA, I think the overall question is still confusing and deters students from identifying. Is there a way to only ask one question on the FAFSA such as: Are you homeless or at risk of being homeless and providing for your own living expenses? Asking the follow-up questions of who made this qualifying determination for you, has still resulted in many financial aid administrators requiring documentation and avoiding making their own determination which could be less burdensome. I think it is important to remove as many barriers as possible. In my experience most students I have made determinations for have skipped this question all together because they did not understand and as a result their FAFSA was rejected.	Tori Nuccio, West Chester University	<p>No Change. Questions 56-58 on the <i>Free Application for Federal Student Aid</i> (FAFSA®) are the means by which an applicant can self-identify as meeting the homeless criteria and be determined independent for FAFSA purposes. There is no requirement for financial aid administrators to request documentation from the applicant proving the determination.</p> <p>Applicants who meet the homeless criteria but do not have a determination from one of the entities listed in questions 56-58 are instructed to contact the financial aid office. The financial aid administrator must make a homeless youth determination and report that determination to the Central Processing System in order for the applicant to be treated as an independent student on the FAFSA.</p> <p>Without the opportunity for applicants to answer questions 56-58, all</p>

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			applicants meeting the homeless criteria would have to get a determination from a financial aid administrator, which the Department of Education believes is an unnecessarily burdensome solution.
16.	<p>1. In item 27 on the paper F AFSA, information about the name, city, and state of the applicant's high school is requested. Please also add the year of high school graduation. This information will assist with identifying students who need to be included in the F AFSA Completion Initiative.</p> <p>2. Questions 44 c and f for students and questions 93 c and f for parents could be consolidated. Both of these items address earnings from student related employment and are treated the same in the need analysis formula. The questions could be combined as follows: "Taxable earnings from need-based employment programs, such as Federal Work Study, need-based employment portions of fellowships and assistantships, and work under a cooperative education program offered by a college."</p> <p>3. In conjunction with questions 56-58, add additional text: "Do you lack adequate, fixed, night-time residence and are you not in the care of a parent or legal guardian?"</p> <p>4. A number of State Grant Agencies use the Applicant Interface (API) to connect their state grant application to the F AFSA. For students utilizing F AFSA on the Web (FOTW), it would be beneficial to improve the presentation of this information at the beginning of the FAFSA by using a larger font. Additionally, better highlighting of the link on the Confirmation page may draw more student attention to this link and improve its utilization.</p>	Elizabeth K. McCloud, Vice President, State Grant and Special Programs, Pennsylvania Higher Education Assistance Agency	<p>1. No Change. The Department of Education needs to further assess the impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the <i>Free Application for Federal Student Aid</i> (FAFSA®).</p> <p>2. No Change. Earnings from a cooperative education program and need based employment are different, and the Department of Education believes they should be asked separately to avoid confusion.</p> <p>3. No Change. The Notes for questions 56-58 on page 10 of the <i>Free Application for Federal Student Aid</i> (FAFSA®) provide this information.</p> <p>4 No Change. The Department of Education needs to further assess the impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the <i>Free Application for Federal Student Aid</i> (FAFSA®).</p>

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	<p>5. In closing, PHEAA would like to thank the U.S. Department of Education (ED) for continuing to keep the order of the school choices that a student provides on the FAFSA when delivering FAFSA information to State Grant agencies. PHEAA, as the administrator of the nation's third largest need-based state grant program, recognizes that this is the optimal application process for those low-income students who benefit the most from Pennsylvania State Grant dollars. We request ED to maintain the current method of transmitting school choice information to state grant agencies in future years as well.</p>		<p>5. Thank you for your comment.</p>
<p>17.</p>	<p>The National Catholic Educational Association welcomes the opportunity to offer these comments regarding the revision of the FAFSA form as requested in Vol. 82, No. 72, of the Federal Register on April 17, 2017. The Higher Education Act (HEA) at 20 U.S.C. 1087tt (a) allows financial aid officers to consider a list of special circumstances to consider when calculating a family's ability to pay college costs. First among those special circumstances listed is "tuition expenses at an elementary or secondary school" followed by medical, dental, or nursing home expenses not covered by insurance...." In addition, the joint explanatory statement of the conference committee for the Higher Education Amendments of 1998, which reauthorized the HEA, clearly indicated the committee's intention that the Secretary of Education "provide notice to students and parents advising them to check with the college financial aid office in the event they have such unusual circumstances." Conferees further instructed that "[t]his notice [of special circumstances] should be prominently displayed on the first page of the FAFSA form". While such notice is displayed in the 2017-18 FAFSA as follows: "If you or your family experienced significant changes to your financial situation (such as loss of employment), or other unusual circumstances (such as high unreimbursed medical or dental expenses), complete this form to the extent you can and submit it as instructed. Consult with the financial aid office at the college(s) you applied to or plan to attend." The inclusion of "tuition expenses at an elementary or secondary school" conspicuously absent even though it is the first of</p>	<p>Dale McDonald, The National Catholic Educational Association</p>	<p>Text has been revised. For more information, see the document entitled <i>Summary of Enhancements to the 2018-2019 Free Application for Federal Student Aid</i>.</p>

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	<p>the circumstances listed in the Act. We urge that the 2018-19 FAFSA and subsequent iterations be amended to identify explicitly "tuition expenses at an elementary or secondary school" as a special circumstance that financial aid officer may consider in calculating a family's ability to pay college costs. Explicitly highlighting that expense would acknowledge the priority Congress established by listing it as the initial example in the statute and would convey to applicants and aid officers alike that such expenses are an allowable consideration.</p>		
18.	<p>1. We appreciate the combined efforts of the Department of Education (ED) and Internal Revenue Service (IRS) in committing to restore the FAFSA Data Retrieval Tool (DRT) in time for the start of the 2018-19 FAFSA processing cycle on October 1, 2017. The disruption caused by its unexpected outage was significant and caused unknown numbers of needy students delays and confusion during the already-stressful financial aid application process. The DRT expansion to permit use by amended tax return filers is also a welcome enhancement, as are plans to implement the Responsive Web Application (RWA) this year to enhance FAFSA on the Web (FOTW) usability for mobile device and tablet users.</p> <p>2. The solution to the data security issues that led to the DRT outage is concerning. Masking the tax information imported from the DRT to the applicant, both online and on the Student Aid Report (SAR), may achieve the desired security solution but is unlikely to be viewed as an improvement by applicants. We are concerned that students and parents will choose to manually enter imported DRT data when they learn that the imported data is not visible to them. In a complicated system that many applicants already see as a "black box", to tell a family that their EFC was determined using IRS data that they are not permitted to review for accuracy may erode trust in the system. The burden to reveal the income data that was used in calculating the EFC will fall on financial aid offices. We understand that the data masking solution is the most expedient for getting the DRT back online, which is our top priority. We ask that ED continue to work with IRS to explore a better long-term solution that both protects applicant data from misuse while still ensuring access to that data for individuals using the DRT for legitimate purposes.</p> <p>3. Another troubling security tradeoff is the recent announcement</p>	Justin Draeger, NASFAA and Jill Desjean, NASFAA	<p>1. Thank you for your comment.</p> <p>2. The Department of Education and Internal Revenue Service will continue to explore ways to improve the IRS Data Retrieval Tool (IRS DRT).</p> <p>3. <a href="#">Refer to comment #3 for resolution.</a></p>

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	<p>that the Internal Revenue Service has canceled plans to incorporate the Verification of Non Filing Status (VONF) into the DRT process. The VONF is consistently reported by financial aid administrators as a roadblock in the application and verification process for students, citing long response times or even a total lack of response from IRS. We encourage ED to work with IRS to revisit plans to permit applicants to securely obtain the VONF using the DRT, as well as to collect and share data on whether the VONF achieves program integrity objectives.</p> <p>4. In Supporting Statement Part A-3, Item 14, the estimated annualized cost for the federal government for 2018-19 FAFSA is reported as \$85,400,728, up from \$45,427,572 for 2017-18. This is a nearly \$40 million increase but the narrative states that it is an increase of \$64,967.14 from the previous year. This is a significant discrepancy and the figures should be doublechecked for accuracy. Supporting Statement Part A-3, Item 12, points out increased estimated FAFSA completion times from 2017-18 to 2018-19 for applicants and cites two causes for the increase: 1) correction of an earlier error related to reporting of completion times for applicants who use the DRT and 2) FSA ID implementation. We have several questions.</p> <p>5. First, the explanation seems to imply that use of the DRT increases FAFSA completion times. We challenge that assertion if we are understanding it correctly.</p> <p>6. Second, the FSA ID was implemented in May 2015, which means that it will have been in place for the entire 2016-17 and 2017-18 application cycles. As such, we would not expect an increase to estimated FAFSA completion time between 2017-18 and 2018-19 due to FSA ID.</p> <p>7. Why, then, is FSA ID cited as an explanation for the 2018-19 increased estimated completion time over the 2017-18 estimate?</p>		<p>4. Thank you for your comment. The Supporting Statement has been revised.</p> <p>5. The increased estimated completion times were partially the result of the Department of Education identifying and correcting an issue that affected the reporting of completion times for IRS Data Retrieval Tool users in the previous supporting statement.</p> <p>6. If an applicant begins an application and decides to create an FSA ID while completing the application, that time is included in the FAFSA completion time. We encourage students and parents to create their FSA ID first, but not everyone chooses to follow that recommendation. Because of the above situation, there will be some variability in completion times depending on when an applicant or parent creates their FSA ID.</p> <p>7. <a href="#">Refer to comment #18.6 for resolution.</a></p> <p>8. The changes for paper FAFSA estimated completion times were</p>

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	<p>8. Lastly, both DRT and FSA ID are associated with FOTW only. As such, we question why estimated burden time is higher in 2018-19 than for 2017-18 for paper FAFSAs- from 1.66 hrs. to 1.9 hours for dependent students and from 1.26 hours to 1.38 hours for independent students- when the paper FAFSA process does not involve either of the factors that were cited as the causes for longer estimated completion times? We encourage ED to explore other explanations as to why estimated completion times are climbing; identification of the causes of increased burden is crucial to improving access to and completion of the application process. NASFAA members are very concerned about FAFSA completion and burden time estimates and would like to offer our assistance in developing a methodology that will provide consistent reporting over time. NASFAA supports any and all efforts to improve the FAFSA application process for applicants and to protect their sensitive personal data. But we stress that FAFSA enhancements must balance access to federal student aid against security and program integrity concerns. The addition of the FSA ID in May 2015 resulted in longer FAFSA completion times, as noted in supporting statements. Another security measure, masking imported DRT tax data, will likely confuse applicants. Requiring the VONF for parents of dependent students and independent students without data supporting its utility is yet another barrier to FAFSA completion and, ultimately, access to federal student aid to ensure college entry and completion. We encourage ED to explore and implement processes that maximize automation of the FAFSA process, such as secure and reliable database matches, to achieve the dual goals of accuracy and access.</p> <p>We appreciate the opportunity to offer these comments and we look forward to working with you on these important issues.</p>		<p>driven by changes in production data captured during application processing which was then entered into the applicant burden model (ABM) to generate the estimates in the supporting statement. The ABM was reviewed and approved by the Office of Management and Budget (OMB) in the 2016-2017 application cycle. The ABM model is explained on page 8 of the supporting statement.</p>
19	<p>Thank you for making changes in response to last year's public comments.</p> <p>The following comments are keyed to pages of the 2017-04-04 draft of the PDF version of the FAFSA.</p> <ol style="list-style-type: none"> <li>1. There should be a comma after "therefore" in the sentence "Your answers will be read electronically; therefore if you complete the form by hand:"</li> </ol>	Mark Kantrowitz	<p>Thank you for your comment.</p> <ol style="list-style-type: none"> <li>1. The text has been revised.</li> </ol>

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	<p>2. If the reference to “days” in the sentence “your SAR will be sent by e-mail within three to five days” is business days, the word “business” should be inserted before the word “days”.</p> <p>3. The trademark notice at the bottom of the page, “The Federal Student Aid logo and FAFSA are registered trademarks of Federal Student Aid, U.S. Department of Education.” Is in 5-point type and is too small to be readable. The Federal Trade Commission requires legal notices to be in at least 6-point type and in the same font size as the predominant text on a page. Many states have plain language statutes that require fine print to be even larger.</p> <p>4. The sentence “The questions on the FAFSA are required to calculate your Expected Family Contribution (EFC).” Is not entirely true, since the answers to some questions are not used to calculate the EFC. For example, questions 10, 11, 12, 13, 17, 19, 20, 24, 25, 27, 30, 31, 38, 60, 69, 71, 72, 87 and 103 are not used to determine eligibility for federal student aid or to calculate the EFC. Insert “Most of” before “the questions” to render the sentence factually accurate. Alternately, you could add “and determine eligibility for federal and state aid” at the end.</p> <p>5. The term “tuition payment plans” in the sentence “Check with your parents’ employers or unions to see if they award scholarships or have tuition payment plans.” Is inaccurate. A tuition payment plan is a tuition installment plan, which breaks up the college bills into equal monthly installments less than a year in total duration. No employers or unions offer tuition payment plans. You are probably thinking of an employer-paid tuition assistance program. Replace the word “payment” with “assistance” in “tuition payment plans.”</p>		<p>2. No change. “Days” does not mean business days.</p> <p>3. No change. The Federal Trade Commission states “Clear and conspicuous” is a performance standard, not a font size.</p> <p>4. Text has been revised. For more information, see the document entitled <i>Summary of Enhancements to the 2018-2019 Free Application for Federal Student Aid</i>.</p> <p>5. Text has been revised. For more information, see the document entitled <i>Summary of Enhancements to the 2018-2019 Free Application for Federal Student Aid</i>.</p> <p>6. No Change. The Department of Education considers this suggestion a stylistic preference.</p>

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	<p>Page 3</p> <p>6. Students and parents continue to be confused by the use of the word “you” to refer to the student, especially when the parents are completing the FAFSA on behalf of the student. Disclosing “you (the student)” once is not enough. Error rates will be reduced if “your” were replaced with “student’s” wherever appropriate.</p> <p>7. Question 21 uses the present tense, “Are you male or female?”, which may confuse transgender students. Perhaps the question should be reworded as “Were you born male or female?”</p> <p>8. Questions 24 and 25 remain ambiguous, leading some first-generation college students to answer the questions incorrectly. Some states consider a student to be first-generation if the student’s parents do not have Bachelor’s degrees or more advanced degrees. Others set the threshold at an Associate’s degree and some at a certificate. The goal of this question is to use the most inclusive definition, leaving it to the states to fine-tune the determination of student eligibility. Thus, the question should ask whether the parents have a Bachelor’s degree (or more advanced degree) or not. If neither parent has at least a Bachelor’s degree, the student may qualify as a first-generation college student under some state’s definition. By wording the answer choice as “College or beyond,” some students may select that answer if their parents have a certificate or Associate’s degree, preventing them from being identified as first-generation in a state that considers first-generation college students to include students whose parents have a highest degree below that of a Bachelor’s degree. There are two possible fixes. One is to change the third answer choice to “Bachelor’s degree or beyond.” The other is to add clarifying instructions to the question or the notes.</p> <p>Page 4</p>		<p>7. Text has been revised. For more information, see the document entitled <i>Summary of Enhancements to the 2018-2019 Free Application for Federal Student Aid</i>.</p> <p>8. No Change. These questions and responses have been carefully selected in consultation with the states since use of the responses varies by state.</p> <p>9. No Change. The Department of Education considers this suggestion a stylistic preference.</p> <p>10. Thank you for your comment.</p> <p>11. No Change. The Department of Education considers this</p>

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	<p>9. In question 29, append “/freshman” after “1st year undergraduate” in the first two answer choices to be consistent with the style of the remaining answer choices.</p> <p>10. In question 29, it is possible for a student to have never attended college previously and yet enter with sophomore or more advanced standing through AP, IB and CLEP credits.</p> <p>11. In question 42 (and, later, question 91), applicants often get confused about whether retirement plan accounts are investments. Including retirement plan accounts in the answer to these questions is one of the most common FAFSA errors, with a significant impact on aid eligibility. Although the notes on page 9 do clarify this, it would be helpful to insert “and qualified retirement plans” after “the home you live in.”</p> <p>12. In the notes on page 9, it would be helpful to have a longer list of examples of qualified retirement plans, including 403(b) plans, 457 plans, SEP, SIMPLE and KEOGH plans. Applicants often get confused about what is and is not a retirement plan. For example, they sometimes exclude money put into a savings account, even though it is not a qualified retirement plan, because they intend to use it for their retirement.</p> <p>Page 5</p> <p>13. The wording “Once” in “Once you answer “Yes” to any of the questions in this step, skip Step Four and go to Step Five on page 8” suggests that the student should immediately skip to Step 5 and not answer the remaining questions in Step Three. The word “Once” has a meaning of “On the occasion of or When.” This conflicts with the practice of the online FAFSA on the Web, where students are required to answer question 47 even if they answer “Yes” to question 46. Substitute the word “If” for the word “Once” to address this.</p> <p>14. The wording of the legal guardianship question, question 55, is not entirely accurate. A stepparent is considered a parent for federal student aid purposes only for as long as the stepparent</p>		<p>suggestion a stylistic preference.</p> <p>12. Thank you for your comment.</p> <p>13. No change. The questions in Step Three of <i>the Free Application for Federal Student Aid (FAFSA®)</i> determine if a student is considered dependent or independent. On the occasion of or when or as soon as students answer “yes” to any of the questions in Step Three on the paper FAFSA, they are independent and not required to answer any other questions in that section. As written, the instructions are correct.</p> <p>14. Thank you for your comment..</p> <p>15. Thank you for your comment.</p>

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	<p>is married to the parent. If the student is in a legal guardianship to the stepparent and the custodial parent dies, the legal guardianship should be sufficient for the student to be considered independent. This problem can be addressed by deleting “or stepparent” from the question. Note that the word “parent” is inclusive of “stepparent” for as long as the stepparent is married to the custodial parent, so the addition of “or stepparent” is not needed from a technical point of view. Of course, you may have added “or stepparent” in a colloquial sense, but then it conflicts with the technical sense.</p> <p>15. The inverse issue arises with question 53, where you substituted “both your parents deceased” for “you an orphan”. If a student were living with the custodial parent and stepparent, the stepparent had not adopted the student, and the custodial parent and stepparent were killed in a car accident, the student might answer “Yes” to this question even though the student is not an orphan due to the non-custodial parent still being alive. I would suggest replacing “were both of your parents deceased” with “were you an orphan (both of your parents deceased)” for clarity.</p> <p>16. Questions 56-58 could be reworded in a more compact format that makes it easier for students to determine that the question does not apply to them by moving the homelessness aspect to the front of the question, thus: At any time on or after July 1, 2017, were you determined to be an unaccompanied youth who was homeless or were self-supporting and at risk of being homeless (See Notes page 10):  56. by your high school or school district homeless liaison?  57. by the director of an emergency shelter or transitional housing program funded by the U.S. Department of Housing and Urban Development?  58. by the director of a runaway or homeless youth basic center or transitional living program?</p> <p>17. The dependency status question about date of birth, question 46, is confusing for many applicants who find date comparisons challenging. Instead of asking “Were your born before January</p>		<p>16. No Change. The Department of Education considers this suggestion a stylistic preference.</p> <p>17. No Change. The Department of Education considers this suggestion a stylistic preference.</p> <p>18. No change. The Department of Education believes the current example is clear as it provides an example of both single and double digit entry.</p> <p>19. No Change. The Department of Education considers this suggestion a stylistic preference.</p> <p>20. Thank you for your comment.</p>

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	<p>1, 1995?”, ask the equivalent “Were you born in 1994 or an earlier year?” The question is easier to comprehend because it asks only about the year and omits the unnecessary detail of the month and day. Rephrasing the question in this manner will reduce the error rate.</p> <p>Page 6</p> <p>18. The example in the sentence “Enter two digits for each day and month (e.g., for May 31, enter 05 31)” is not maximally clarifying, since it does not speak to how to enter a single digit day. Change the example to be “for May 3, enter 05 03” to address this problem.</p> <p>19. The inclusion of the wording “, and” after “Last Name” in questions 62 and 66 is not necessary and is not consistent with the pattern used for question 1.</p> <p>20. Question 69 refers to the parents’ e-mail address as a single email address, when parents may each have their own email address. If a significant number of parents try to enter two email addresses in the answer to question 69, then change the wording to refer to “one of your custodial parents’ e-mail addresses.”</p> <p>21. In the online FAFSA, if the applicant said that the parents were unmarried and living together, it should provide the same advice to call 1-800-433-3243 in answering the questions about parent tax returns. I’ve seen many cases where the parents are unmarried yet file tax returns as married filing jointly, which is an incorrect status. Similarly, I’ve also seen many cases where both parents incorrectly filed with head of household status, even though they were not eligible to do so. More built-in help on this topic would be helpful, especially with the tax filing status question.</p> <p>22. The instructions in questions 74 and 96 are incomplete, as the college must be a Title IV institution per 20 USC 1087nn(b)(3), 20 USC 1087oo(b)(3), 20 USC 1087pp(a)(2) and 20 USC</p>		<p>21. The online <i>Free Application for Federal Student Aid</i> (FAFSA®) includes messaging and help text to assist applicants and parents in these scenarios.</p> <p>22. No Change. The Department of Education believes the addition of this text would create confusion since it is unlikely that applicants know if a school is a Title IV institution.</p> <p>23. No Change. The instructional note on page one of the <i>Free Application for Federal Student Aid</i> (FAFSA®) under “Using Your Tax Return” states that “Both parents or both the student and spouse may need to report income information on the FAFSA if they did not file a joint tax return for 2016. For assistance with answering the income information questions in this situation, call 1-800-4-FED-AID (1-800-433-3243).”</p> <p>24. Text has been revised. For more information, see the document entitled <i>Summary of Enhancements to the 2018-2019 Free Application for Federal Student Aid</i>.</p> <p>25. Text has been revised. For more information, see the document</p>

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	<p>1087qq(a)(3). For example, if the student’s sibling is enrolled at a foreign institution that is not eligible for U.S. federal student aid, the sibling cannot be counted in the number in college. This problem can be addressed by inserting “eligible” before “program” and “at a college or university that is eligible for U.S. federal student aid” after “college degree or certificate”.</p> <p>Page 7</p> <p>23. A frequent question from parents who file separate returns is how to answer questions 85-87. Adding instructions to “If your parents file separate federal income tax returns, add the figures from their income tax returns together.” Should help address this problem. Of course, then there’s the potential for confusion when the parents are divorced or separated but not living together. Maybe use “If Parent 1 and Parent 2 file separate income tax returns, add the figures from their income tax returns together.”</p> <p>Page 8</p> <p>24. State grant agencies are referred to as “state student grant agency” and “state grant agency” in Step Six. Using different terminology may be confusing for students, especially since no state grant agency is ever referred to as a “state student grant agency”. It may be best to use “state grant agency” in both locations.</p> <p>25. The sentences “However, the order in which you list schools may affect your eligibility for state aid. Check with your state grant agency for more information.” Is not very helpful for students, as the information is not easily accessible from state grant agencies. It might be better to simply give the advice to list an in-state college first on the FAFSA in order to qualify for state grants.</p> <p>26. Question 103 provides space for only 4 colleges. According to the 2016 edition of The American Freshman published by UCLA HERI, only 40.5% of freshmen in 2016 applied to four or fewer colleges. 92.5% applied to 10 or fewer colleges. Why not add another page to the FAFSA to allow students submitting the paper</p>		<p>entitled <i>Summary of Enhancements to the 2018-2019 Free Application for Federal Student Aid</i>.</p> <p>26. No Change. Specific instructions for adding more schools to the <i>Free Application for Federal Student Aid (FAFSA®)</i> are on page 2, as stated in the Step Six instructions.</p> <p>27. No Change. In consulting with members of the financial aid community, the Department of Education has concluded that the community does not overwhelmingly support this proposed change.</p> <p>28. Thank you for your comment.</p> <p>29. Thank you for your comment.</p> <p>30. Thank you for your comment.</p>

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	<p data-bbox="489 196 1185 256">FAFSA to list up to 10 colleges, just as they can do on the online FAFSA?</p> <p data-bbox="489 300 1225 488">27. If an additional page is added to the FAFSA to accommodate up to 10 colleges, there will be room to add a question about the most common special circumstances, such as the ones mentioned in the statute at 20 USC 1087tt. This will allow college financial aid administrators to proactively identify students whose FAFSAs may not adequately reflect their ability to pay.</p> <p data-bbox="489 532 1212 656">28. Consistent with the criminal penalties in 20 USC 1097, the signing statement in Step Seven should be modifies to add “for up to 5 years” after “sent to prison.” Mentioning the potential prison term may help reduce fraud rates.</p> <p data-bbox="489 699 567 724">Page 9</p> <p data-bbox="489 768 1204 857">29. The advice to DACA students to file the FAFSA is not always accurate. California, for example, has a separate California Dream Act application and tells DACA students not to file the FAFSA.</p> <p data-bbox="489 901 1231 1349">30. The definition of “net worth” (and later in the same column, “investment value”) is inconsistent with the statutory definition in 20 USC 1087vv(h). The statutory definition is “The term “net assets” means the current market value at the time of application of the assets (as defined in subsection (f)), minus the outstanding liabilities or indebtedness <b>against</b> the assets.” Thus, for debts to be subtracted from the market value of an asset, the debts must be secured by the assets, not merely “related” to those assets as in the FAFSA definition. (Note that in the discussion of business debt, you do use the word “collateral.” The use of different terminology – related in one place and collateral in another – might suggest a different treatment to applicants, even though net worth in both cases is defined in the same paragraph of the Higher Education Act of 1965.</p> <p data-bbox="489 1393 1204 1472">This matters, for example, when a family uses a home equity loan against the family’s principal place of residence to buy a vacation home. The home equity loan should not be subtracted from the</p>		<p data-bbox="1577 841 1943 865">31. Thank you for your comment.</p>

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	<p>market value of the vacation home, because it is not a debt against the vacation home. Rather, the debt is secured by the principal place of residence, which is not a reportable asset on the FAFSA. The use of the word "related" in the FAFSA notes might suggest to an applicant that he/she should reduce the net worth of the vacation home by the amount of the home equity loan because it was related to the vacation home, since the money was used to buy the vacation home, even though the statute clearly indicates that only debts secured by an asset may be subtracted from the market value of the asset.</p> <p>31. The definition of "investments" is missing "tax shelters," which is mentioned in the statute at 20 USC 1087vv(f)(1).</p>		
20	<p>The <i>Higher Education Act</i> (HEA) at 20 U.S.C. 1087tt(a) allows financial aid officers to consider elementary and secondary school tuition expenses as a special circumstance in calculating a family's ability to pay college costs. Specifically, the statute reads as follows: "Special circumstances may include tuition expenses at an elementary or secondary school, medical, dental, or nursing home expenses not covered by insurance...." And the statute goes on to list additional examples of special circumstance. Note, however, that "tuition expenses at an elementary or secondary school" is identified as the first example in the statute. In addition, the joint explanatory statement of the conference committee for the <i>Higher Education Amendments of 1998</i>, which reauthorized the HEA, clearly indicated the committee's intention that the Secretary of Education "provide notice to students and parents advising them to check with the college financial aid office in the event they have such unusual circumstances." Conferees further instructed that "[t]his notice should be prominently displayed on the first page of the FAFSA," (the federal financial aid form). Indeed, the notice is displayed in the 2017-18 FAFSA as follows: "If you or your family experienced</p>	Joe McTighe, Council for American Private Education	<a href="#">Refer to comment #17 for resolution.</a>

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	<p>significant changes to your financial situation (such as loss of employment), or other unusual circumstances (such as high unreimbursed medical or dental expenses), complete this form to the extent you can and submit it as instructed. Consult with the financial aid office at the college(s) you applied to or plan to attend.” Note that the example provided of “unusual circumstances” is the second example listed in the statute, not the first, which, as noted above, is “tuition expenses at an elementary or secondary school.”</p> <p>We urge that the 2018-19 FAFSA and subsequent iterations be amended to identify explicitly “tuition expenses at an elementary or secondary school” as a special circumstance that financial aid officer may consider in calculating a family’s ability to pay college costs. Explicitly flagging that expense would acknowledge the priority Congress established by listing it as the initial example in the statute and would convey to applicants and aid officers alike that such expenses are an allowable consideration.</p>		
21.	<p>A college degree is increasingly necessary to move out of poverty and homelessness and live a healthy, productive life. Yet, youth experiencing homelessness face barriers in transitioning from secondary to post-secondary education, as well as barriers to financial aid, college retention, and college completion. These barriers are particularly acute for unaccompanied homeless youth, who face the struggles of homelessness without the support of a parent or guardian, and do not have access to parental income information or signature. The undersigned organizations therefore wish to express our strong support for the removal of the definition of “youth” from the notes for questions 56-58 on the proposed 2018-2019 Free Application for Federal Student Aid (FAFSA). Previous versions of the FAFSA had defined “youth” for unaccompanied homeless youth as age 21 and under. This definition created barriers for unaccompanied homeless youth who were 22 or 23 years old, who were often forced to submit extensive and burdensome documentation to prove their homeless status until they were no longer considered “dependent” at age 24. The removal of the definition of “youth” will allow for a more streamlined process for students, as well as for financial aid</p>	Barbara Duffield, Executive Director of SchoolHouse Connection and Eric Masten, Director of Public Policy at the National Network for Youth	Thank you for your comment.

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	administrators. It is consistent with the statute. We applaud this proposed change.		
22.	<p>On behalf of the National Council of Higher Education Resources (NCHER), thank you for the opportunity to provide our comments on the 2018-2019 Free Application for Federal Student Aid (FAFSA). NCHER is a national, nonprofit trade association that represents higher education service agencies (such as state and nonprofit guaranty agencies, loan servicers, secondary markets, lenders, financial literacy providers, collection agencies, and postsecondary institutions) that help families and students develop, pay for, and attain their educational goals so they can pursue meaningful and rewarding work and become contributing members of society. NCHER members provide a range of college access and success services and programs to students, parents, schools, and community organizations to help individuals gain access to and succeed at postsecondary education. This includes financial aid awareness, consumer education, FAFSA completion services and events, borrower assistance, ombudsman support, training and assistance programs to high school counselors and financial aid administrators, and a wide range of programs and services on budgeting, establishing good credit, paying for college, and successfully managing debt.</p> <p>We would like to thank the Department for two important recent announcements related to the FAFSA - the enhancements made to the FSA ID creation and retrieval process and the decision that the Institutional Student Information Record sent to state grant agencies will continue to present the colleges in the order they were listed by the student on the FAFSA. Both of these issues are extremely important to NCHER members and were included as part of our 2017-2018 FAFSA comments. We sincerely thank the Department for addressing both items to help ensure the best possible FAFSA experience for students and families and the delivery of critical state grant aid.</p> <p>Thank you again for the opportunity to provide recommendations on the proposed 2018-2019 FAFSA. NCHER looks forward to continuing to play an active role in simplifying and streamlining the federal financial aid system based on the unique role our members play in our states and communities.</p>	James P. Bergeron and Vicki Shipley, National Council of Higher Education Resources	Thank you for your comments. We will share your comment about the FSA ID enhancements with the appropriate business unit at the Department of Education.
23.	The 2017-18 FAFSA October 1 start date and change to use prior-prior year income show early signs of success, with more than 5.4	Kim Cook, Executive Director, National College	

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	<p>million students completing the FAFSA before it was even available in the 2016-17 application year. Unfortunately, this year was not all good news, given the outage of the IRS Data Retrieval Tool for FAFSA filers. Looking ahead to the 2018-19 FAFSA, the National College Access Network (NCAN) sees opportunities to continue this progress and to rebuild from the DRT setbacks. Outlined below you will find proposed changes NCAN supports as well as recommendations for further improvement. Thank you for this important opportunity to suggest advancements for students.</p> <p><b>The following changes to the FAFSA for 2018-19 will improve the ability of NCAN's population of low-income, first-generation students and students of color to access federal financial aid:</b></p> <p>1. For the 2018-19 year, dependent students who do not file taxes will not be required to request Verification of Non-Filer Status from the IRS. For students who are low-income or do not work, this change will alleviate the hassle of obtaining paperwork from the IRS during the peak of tax season for a purpose that is not the IRS's top priority. The acknowledgement that dependent students who aren't filing taxes likely aren't required to do so will allow millions of students an easier path to higher education.</p> <p>2. The decision on June 8, 2017 to allow state systems of higher education to access the student institutional list order on the FAFSA will also help ensure that states have access to the information they need to request adequate funds for their state aid programs. Adjusting this policy to hide the list order from institutions but provide it to states is the right balance to help students access the aid they need without providing perverse incentives to institutions.</p> <p>3. The United States Digital Services and Federal Student Aid partnership successfully improved the FSA ID process. NCAN thanks the Department for the opportunity to provide feedback and is especially pleased to see SMS text messaging as an option for FSA ID confirmation and password reset. NCAN will observe the impact of these changes during the 2018-19 filing season and will follow up with barriers not yet resolved.</p> <p><b>The following changes to the FAFSA for 2018-19 are detrimental to NCAN's population of students, as they increase the burden on the student to be able to access federal financial aid:</b></p> <p>4. Last year, NCAN stated that "requiring a 4506-T causes an unnecessary and duplicative burden on students and does not</p>	<p>Access Network, and Carrie Warick, National College Access Network</p>	<p>1. We will share this comment with the appropriate business unit at the Department of Education.</p> <p>2. Thank you for your comment.</p> <p>3. We will share this comment with the appropriate business unit at the Department of Education.</p> <p>4. We will share this comment with the appropriate business unit at the Department of Education.</p>

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	<p>provide any additional information to agencies or institutions providing financial aid.” The change for dependent non-filers, as noted above, is appreciated. In light of the burden on parents and independent students to obtain verification of non-filer documentation from the IRS, NCAN encourages the Department of Education to pursue pathways to streamline this process for FAFSA filers. FAFSA filers flagged to verify this information are most likely doing so during the peak of tax season, and NCAN members assisting FAFSA filers found inconsistent training among IRS staff and a longer-than-anticipated return time for these documents.</p> <p><b>The following are recommended changes from NCAN for the 2018-19 FAFSA that would be beneficial to NCAN’s population of students, as they would decrease the burden on the student to be able to access federal financial aid:</b></p> <p>5. The location of the “enter high school button” is not in an obvious place. NCAN members report that students inadvertently skip entering in their high school because of the layout of this section. NCAN recommends revising this section of the online FAFSA to be more user-friendly and intuitive. Increasing the accuracy of this question would help support communities in their FAFSA completion efforts, because it would help alleviate any concerns about undercounting students in the High School FAFSA Completion Tool.</p> <p>6. Question 23 on the 2017-18 paper FAFSA asks students to identify if they have a drug offense that occurred while they were receiving federal student aid. This question is arbitrary, as individuals who committed offenses other than drug offenses or who committed the same crimes during a different period remain eligible for aid. It is also confusing and discourages students who may have had trouble with drugs from bettering their future prospects by applying for financial aid and attending college. NCAN recommends removing this question from the FAFSA to allow all students the opportunity to further their studies.</p>		<p>5. No Change. The Department of Education needs to further assess the impact of this recommendation in conjunction with pertinent stakeholders and ongoing departmental priorities. This recommendation will be considered as a potential future enhancement to the <i>Free Application for Federal Student Aid</i> (FAFSA®).</p> <p>6. No Change. This question is statutorily required. Refer to the 2018-2019 <a href="#">Justification of Data Elements</a> posted with the clearance package.</p>
24.	<p>The Association of Christian Schools International (ACSI) takes this opportunity to offer the following comment regarding the matter noted above, as requested in Vol. 82, No. 72, of the <i>Federal Register</i> on April 17, 2017, starting at 82 FR 18121. As a member-organization of the Council for American Private Education (CAPE),</p>	<p>P. George Tryfiates, Director for Government Affairs, Association of Christian Schools International</p>	<p><a href="#">Refer to comment #17 for resolution.</a></p>

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	<p>we wish to add our voice to that of CAPE in emphasizing the points below. ACSI has nearly 3000 member K-12 schools whose parents sacrifice to pay tuition. This necessarily has an impact upon their capacity to take on college costs for older children who have moved to higher education. It would be of great benefit to those parents to know that the law considers elementary and secondary tuition expenses a special circumstance which financial aid officers may consider in determining a family's ability to pay college expenses.</p> <p>The <i>Higher Education Act</i> (HEA) at 20 U.S.C. 1087tt(a) states precisely that. Specifically, the statute reads as follows: "Special circumstances may include tuition expenses at an elementary or secondary school, medical, dental, or nursing home expenses not covered by insurance...." And the statute goes on to list additional examples of special circumstance. Note, however, that "tuition expenses at an elementary or secondary school" is identified as the first example in the statute.</p> <p>In addition, the joint explanatory statement of the conference committee for the <i>Higher Education Amendments of 1998</i>, which reauthorized the HEA, clearly indicated the committee's intention that the Secretary of Education "provide notice to students and parents advising them to check with the college financial aid office in the event they have such unusual circumstances." Conferees further instructed that "[t]his notice should be prominently displayed on the first page of the FAFSA," (the federal financial aid form).</p> <p>Indeed, the notice is displayed in the 2017-18 FAFSA as follows: "If you or your family experienced significant changes to your financial situation (such as loss of employment), or other unusual <b>ASSOCIATION OF CHRISTIAN SCHOOLS INTERNATIONAL</b> circumstances (such as high unreimbursed medical or dental expenses), complete this form to the extent you can and submit it as instructed. Consult with the financial aid office at the college(s) you applied to or plan to attend." Note that the example provided of "unusual circumstances" is the second example listed in the statute, not the first, which, as noted above, is "tuition expenses at an elementary or secondary school."</p> <p>Therefore, we join CAPE in urging that the 2018-19 FAFSA and subsequent iterations be amended to identify explicitly "tuition expenses at an elementary or secondary school" as a special circumstance that a financial aid officer may consider in calculating</p>		

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	<p>a family's ability to pay college costs. Explicitly flagging that expense would acknowledge the priority Congress established by listing it as the initial example in the statute and would convey to applicants and aid officers alike that such expenses are an allowable consideration.</p> <p>In conclusion, it may be helpful to know that ACSI is a nonprofit association providing support services to nearly 24,000 Christian schools in over 100 countries. As the world's largest association of Protestant schools, ACSI serves 2,800 Christian preschools, elementary, and secondary schools and 90 post-secondary institutions in the United States alone. We are a leader in strengthening Christian schools and equipping Christian educators worldwide. ACSI accredits Protestant pre-K – 12 schools, provides professional development and teacher certification, and offers its member-schools high-quality curricula, student testing and a wide range of student activities. Member-schools educate some 5.5 million children around the world.</p>		
25.	<p>Thank you for listening to my concerns about the serious roadblocks unaccompanied homeless students face in applying for and receiving financial aid. Removing these barriers can help more young people pursue a college degree and achieve their dreams.</p>	<p>Bryce McKibben and Senator Patty Murray, U.S. Senate Committee on Health, Education, Labor, &amp; Pensions</p>	<p>Thank you for your comment.</p>